



U.S. DEPARTMENT OF JUSTICE
Federal Bureau of Prisons
Metropolitan Detention Center

80 29th Street
Brooklyn, New York 11232

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April 29, 2021

BY ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: ***United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)***

Dear Judge Nathan:

This letter is written in response to your April 28, 2021, Order seeking the following information regarding an alleged incident involving Ghislaine Maxwell, Register No. 02879-509, at the Metropolitan Detention Center in Brooklyn, New York (MDC Brooklyn) on April 24, 2021:

1. An inventory of the items seized from Ms. Maxwell in the incident that occurred on April 24, 2021 shall be provided by email to defense counsel only;
2. A representation indicating whether any of the seized materials were duplicated in any fashion and what investigation was undertaken in order to determine this information;
 - a. A representation indicating whether Ms. Maxwell is permitted to bring confidential legal materials to in-person meetings with defense counsel without those materials being seized; and
 - b. What steps have been or will be taken to ensure the confidentiality of Ms. Maxwell's lawyer-client communications.

At no point during or after Ms. Maxwell's April 24, 2021, legal visit were any materials seized and retained by MDC Brooklyn staff. Those materials that defense counsel gave to Ms. Maxwell contrary to MDC Brooklyn's legal visit procedures were confiscated by staff and return

to defense counsel on April 25, 2021. In addition, none of Ms. Maxwell's legal materials, including those items given to her during the April 24, 2021, legal visit, were photocopied. Supervisory staff discussed the incident with the staff involved and reviewed video surveillance footage.

Ms. Maxwell may bring any legal materials she wishes to carry from her housing area to her in-person legal meetings with defense counsel. Pursuant to Institutional Supplement BRO-5267.09A, *Inmate Visiting Correctional Services*, an inmate's legal material are visually inspected for contraband by the Visiting Room Officer. To ensure inmates do not bring unauthorized materials into the institution, inmates are only allowed to remove those legal materials they brought to the legal visit.

All legal visits are subject to visual monitoring only. In addition to in-person legal visits, Ms. Maxwell may request unmonitored legal calls through Unit Team and she meets with defense counsel via video-teleconferences Monday through Friday for five (5) hours per day in a private room subject to visual supervision. MDC Brooklyn will continue to abide by said procedures to ensure attorney-client communications remain confidential.

Respectfully submitted,

/s/ *Sophia Papapetru*

Sophia Papapetru
Staff Attorney
MDC Brooklyn
Federal Bureau of Prisons